

REMARKS

Claims 1-24 are pending in the application, with claims 1-8 being independent. Claims 1-4, 10, 11, 13, 14, 17 and 18 have been amended. Claim 1 has been amended to recite the feature of claim 13 and to further recite an electrode height such as is recited in the application at, for example, page 9, lines 14 and 15. Claim 2 has been amended to recite the feature of claim 10, to recite a passivation film such as is recited in the application at, for example, page 13, lines 7 and 8, and to recite that the electrodes are formed directly on the insulator, as recited in the application at, for example, page 9, lines 3 and 4. Claim 3 has been amended to recite that at least one of the first and second electrodes has a trapezoidal cross section, as shown in Fig. 12, and that an electrode side surface forms a 50° to 70° angle with an insulator surface, as recited in the application at, for example, page 4, line 18. Claim 4 has been amended to recite the feature of claim 10 and to recite that the source wiring, the power supply line and the reflective film are formed directly on the insulator, as recited in the application at, for example, page 8, lines 17-20. Claims 10, 11, 13 and 14 have been amended in view of the amendments to the independent claims, and claims 17 and 18 have been amended for clarity. Finally, claims 23 and 24, which find support in claim 12, have been added. No new matter has been introduced.

Applicant acknowledges with appreciation the Examiner's allowance of claims 5-8 and 19-21.

Claims 2, 10, 14 and 16 have been rejected as being anticipated by Yap (U.S. Patent No. 6,307,528), and claims 2 and 16 have been rejected as being anticipated by Yamada (U.S. Patent No. 6,426,179). Applicant requests reconsideration and withdrawal of these rejections because neither Yap nor Yamada describes or suggests forming first and second electrodes directly on an insulator formed over a thin film transistor, or forming a passivation film between the electrodes and a reflective film. For example, the electrodes 54 and 62 of Yap, which the rejection equates with the recited first and second electrodes, are formed in a stacked relationship (see Fig. 3A of Yap) such that they necessarily cannot both be formed directly on the same insulator. The electrodes 61 and 67 of Yamada, which the rejection equates with the recited first and second electrodes, are formed in a similar stacked relationship (see Fig. 4B of Yamada).

Claims 1-4, 10, 12 and 14-18 have been rejected as being unpatentable over Haynes (U.S. Patent No. 6,054,809) in view of Yamada.

With respect to claim 2 and its dependent claims, applicant requests reconsideration and withdrawal of this rejection because Haynes does not remedy the failure of Yamada to describe or suggest forming first and second electrodes directly on an insulator formed over a thin film transistor. While the rejection indicates that Haynes' disclosure of an iso-planar electrode arrangement would have led one of ordinary skill in the art to rearrange the electrodes of Yamada, applicant respectfully disagrees. In particular, Yamada is directed to a display device in which each organic EL element 60 corresponding to a pixel must be separately controlled, and this arrangement simply is not conducive to an iso-planar arrangement such as is described by Haynes, which is directed to providing a lamp function instead of a display in which pixels are separately controlled.

Applicant also disagrees that there would have been any motivation to combine Haynes and Yamada in the manner suggested. While the rejection indicates that this motivation would have come from a desire to include the driving circuitry of Yamada in the lamp of Haynes in order to achieve a smaller device, the driving circuitry of Yamada, which is directed to separately controlling the pixels of a display, would have been unsuitable for driving the lamp of Haynes. Nor does the rejection, or either reference, provide any indication as to how these disparate circuits would be combined.

Accordingly, for at least these reasons, the rejection of claim 2 and its dependent claims should be withdrawn.

Like claim 2, independent claims 1, 3 and 4 recite forming first and second electrodes directly on an insulator formed over a thin film transistor. Accordingly, applicant requests reconsideration and withdrawal of the rejection of claims 1, 3 and 4, and their dependent claims, for at least the reasons discussed above.

In addition, as noted above, claim 1 has been amended to recite the feature of claim 13, which was not rejected over Haynes in view of Yamada. Accordingly, applicant requests

reconsideration and withdrawal of the rejection of claim 1 and its dependent claims for at least this additional reason.

As noted above, claim 3 has been amended to recite that at least one of the first and second electrodes has a trapezoidal cross section, and that an electrode side surface forms an angle of 50° to 70° with the insulator surface. Neither Haynes nor Yamada describes or suggests these aspects of the claim. Accordingly, applicant requests reconsideration and withdrawal of the rejection of claim 3 and its dependent claims for at least this additional reason.

As noted above, claim 4 has been amended to recite that the source wiring, the power supply line and the reflective film are formed directly on the insulator. Neither Haynes nor Yamada describes or suggests this aspect of the claim. Accordingly, applicant requests reconsideration and withdrawal of the rejection of claim 4 and its dependent claims for at least this additional reason.

Claims 2 and 11 have been rejected as being unpatentable over Nagayama (U.S. Patent No. 5,742,129) in view of Yamada. Applicant requests reconsideration and withdrawal of this rejection because Nagayama does not remedy the failure of Yamada to describe or suggest forming first and second electrodes directly on an insulator formed over a thin film transistor, as recited in claim 2.

Claim 9 has been rejected as being unpatentable over Haynes in view of Yamada and Okada (U.S. Patent Publication 2001/004930). Applicant requests reconsideration and withdrawal of this rejection because Okada does not remedy the failure of Haynes and Yamada to describe or suggest the subject matter of the independent claims.

Claims 11 and 22 have been rejected as being unpatentable over Haynes in view of Yamada and Alain (U.S. Patent No. 6,569,544). Applicant requests reconsideration and withdrawal of this rejection because Alain does not remedy the failure of Haynes and Yamada to describe or suggest the subject matter of the independent claims.

Claim 22 has been rejected as being unpatentable over Nagayama in view of Yamada and Haynes. Applicant requests reconsideration and withdrawal of this rejection because Haynes

Applicant : Takeshi Fukunaga
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does not remedy the failure of Nagayama and Yamada to describe or suggest the subject matter of the independent claims.

Claim 13 has been rejected as being unpatentable over Yap. Applicant requests reconsideration and withdrawal of this rejection for the reasons discussed above with respect to the rejection of claim 2 as being anticipated by Yap.

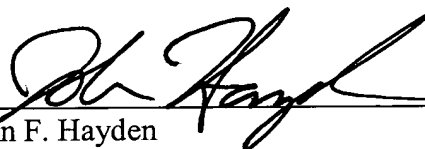
Applicant submits that all claims are in condition for allowance.

No fees are believed to be due. Please apply any charges or credits to deposit account 06-1050.

Respectfully submitted,

Date: _____

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John F. Hayden
Reg. No. 37,640

Fish & Richardson P.C.
1425 K Street, N.W.
11th Floor
Washington, DC 20005-3500
Telephone: (202) 783-5070
Facsimile: (202) 783-2331